

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: January 22, 2010

Name of company(s) covered by this certification: Devine Communications, Inc.

Form 499 Filer ID: 827218

Name of signatory: Douglas Devine

Title of signatory: President

I, Douglas Devine, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. Please see accompany statement.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI , and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).



January 22, 2010

DEVINE COMMUNICATIONS, INCORPORATED

CONFIDENTIALITY POLICY & PROCEDURES

1. Purpose

To inform every Devine Communications, Incorporated (“Company”) employee of their individual and collective responsibility for maintaining the confidentiality of company information, customer proprietary network information (“CPNI”), and other information collected in the course of providing service to customers.

2. Scope

This policy applies to all employees of Company.

3. Policy

It is the policy of Company that the business affairs of the Company should not be discussed with anyone outside the Company except when required in the normal course of business, and the Company information and information collected in the course of providing service to customers should be handled in compliance with all applicable law and the procedures described below.

4. Definitions

Customer proprietary network information is:

- i) Information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer and that is made available to the Company by the customer solely by virtue of the customer-carrier relationship; and
- ii) Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.

The term CPNI does not include customer names, addresses, and telephone numbers.

5. Procedure

- A. The operations of the Company should not be discussed with third parties, and particularly not with competitors, except as required in the normal course of business. Access to certain confidential of sensitive Company information will be limited to those employees with a “need to know.” Unauthorized employees are prohibited from attempting to obtain such information.
- B. Information concerning the activities or operations of the Company’s suppliers or customers is confidential.
- C. Employees handling confidential information are responsible for its security. Appropriate care must be exercised to ensure that confidential information is safeguarded to protect the Company, its customers, and its suppliers.
- D. No CPNI may be disclosed to third parties. CPNI may be disclosed to customers only in compliance with Section 222 of the Communications Act and any regulations implementing Section 222. CPNI may be used for internal purposes only in compliance with Section 222 of the Communications Act and any regulations implementing Section 222. It is the Company’s current policy not to use CPNI for marketing any services.
- E. Company files are not to be taken from Company premises without the consent of the appropriate supervisor.
- F. Nothing contained in this policy is intended to prohibit the disclosure to third parties of information about the Company that is routinely made available to the public by advertisement or otherwise,

such as the nature of the Company's products and services and its business hours.

- G. Any employee questions regarding the confidentiality of information should be raised with the employee's immediate supervisor.
- H. Violations of this policy will subject an employee to disciplinary action, up to and including immediate termination of employment.



Name: Douglas Devine
Title: President
Date: January 22, 2010